

DRAFT
Surface Coating of Wood Building Products NESHAP - subpart QQQQ
Applicability Statement:

An *affected source* is the collection of the following items, including but not limited to: storage containers, mixing vessels, coating application equipment and coating curing/drying equipment used for surface coating of wood building products.

Regulated Entities. The source category, which is divided into the five subcategories listed in Table 1, includes sources that apply coatings to wood building products. In general, sources that coat wood building products are covered under the Standard Industrial Classification (SIC) and North American Industrial Classification System (NAICS) codes listed in Table 1. However, sources classified under other SIC or NAICS codes may be subject to the final standards. Not all sources classified under the SIC and NAICS codes in Table 1 will be subject to the final standards because some of the classifications cover products outside the scope of the NESHAP for wood building products. This table is not intended to be exhaustive, but rather provides guidance regarding subcategories and entities likely to be regulated by this subpart.

Table 1. Subcategories and Entities Potentially Regulated by the Final Standards

Subcategory	SIC	NAICS	Examples of regulated entities include those sources that apply a surface coating to ...
Doors, Windows and Miscellaneous	2431, 2499 ^a	321911, 321918, 321999 ^a	doors, finished doorskins, finished exterior siding, windows, door and window components such as millwork, moulding, or trim and other miscellaneous wood building products (including, but not limited to, moulding, millwork, trim, shingles and shutters).
Flooring	2426, 2421, 2499 ^a	321918, 321999 ^a	solid wood flooring, engineered wood flooring and wood laminated flooring.
Interior Wall Paneling and Tileboard	2435, 2499 ^a	321211, 321999 ^a	interior wall paneling or tileboard.
Other Interior Panels	2435, 2436, 2493, 2499 ^a	321211, 321212, 321219, 321999 ^a	panels that are sold for uses other than interior wall paneling, such as coated particleboard, hardboard and perforated panels.
Exterior Siding and Primed Doorskins ^b	2435, 2493, 2499 ^a	321211, 321219, 321999 ^a	panel siding, trimboard, lap siding, trim associated with siding and primed doorskins.

^a The subcategory of the SIC code and NAICS code depends on the final end use of the product.

^b A doorskin or exterior siding coated with more than primer is included in the doors, windows and miscellaneous subcategory.

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Applicability Statement (continued):

Your wood building products surface coating operations are NOT subject to subpart QQQQ if:

- 1) your affected source is not located at a major source of HAP emissions;
- 2) your affected source uses less than 4,170 liters (1,100 gallons) of total coatings per year;
- 3) your surface coating operations are covered by the Plywood and Composite Wood Products NESHAP (subpart DDDD) upon promulgation [edge seals, anti-skid coatings, primers applied to waferboard or oriented strand board (OSB), logos, trademarks, grade stamps, nail lines, synthetic patches, wood patches, wood putty, concrete forming oil and other drying or tempering oils, veneer composing, shelving edge fillers and surface coating that occurs during the manufacture of fiberboard];
- 4) your surface coating operations are covered by the Wood Furniture Manufacturing Operations NESHAP (subpart JJ) [surface coating of wood furniture including: finishing, gluing, cleaning, and washoff operations associated with the production of wood furniture or wood furniture components and surface coating of millwork and trim associated with cabinet manufacturing];
- 5) your surface coating operations occur during the manufacture of prefabricated homes or mobile/modular homes;
- 6) your surface coating operations occur at research or laboratory facilities; janitorial, building, and facility construction or maintenance operations; or hobby shops that are operated for personal rather than for commercial purposes; or non-commercial coating operations or coating applications using handheld nonrefillable aerosol containers; or
- 7) your surface coating operations involve wood treatment or fire retardant operations located at wood building products sources that involve impregnating the wood product with the wood treatment chemicals or fire retardant by using a retort or other pressure vessel.

In addition, if your affected source uses at least 95 percent of its total annual coating usage for surface coating operations that are subject to the requirements of a NESHAP other than QQQQ, you may demonstrate compliance with all the requirements, including all applicable emission limits, for that subpart.